



**ATTACHMENT A
REMARKS**

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In the Final Rejection mailed in the parent application on November 7, 2003, claims 45-90 were rejected under 35 USC 103(a) as being "unpatentable over" the newly cited Barrett patent. This rejection is respectfully traversed although claim 45 has been amended to even more clearly distinguish over the Barrett patent.

The Barrett patent relates to a reconfigurable controller for monitoring and controlling environmental conditions and, in particular, for monitoring and controlling climate conditions in a large office building. The system includes "a plurality of device controllers 13 each having a connected air terminal unit 15 or other control device 17 and one or more physical parameter sensors 19. Controllers 13 are connected to a data concentrator 23 which stores condensed information received from each separate controller. Data concentrator 23 communicates with a personal computer 25 in order to receive commands from the operator of the system as well as to communicate data to the operator via a CRT display 27" (see lines 15-26 of column 3).

It is respectfully submitted that the present invention as claimed in claim 45 and the claims dependent thereon is completely different from the reconfigurable controller disclosed in the Barrett patent. The Barrett patent obviously has nothing to do with the problems addressed and solved by the present invention and is instead concerned with a different set of problems associated with controlling climate conditions in a large office building. Further, contrary to the reading of the claim 45 provided by the Examiner, the Barrett patent does not disclose a computer card bearing any relationship to that claimed. The only card that appears to be disclosed in the Barrett patent is a motor control card and this has no relationship to the invention nor to the reading of the claim on Barrett set forth in the Office Action.

As admitted in the Office Action, the sensors set forth in the claims are all being read on the "physical parameter sensor" 19 while some of the various controls are being read on the controllers 13 of Figure 1. The Examiner basically ignores a number of the recitations of the claim, and, with respect to others, the parts of the patent to which reference is made simply do not correspond to what is being claimed. For example, in the latter regard, the Examiner reads the language "including in a front part thereof, a

liquid crystal display and a data input keyboard for entering data into the computer card” as element 25 of Figure 4. However, element 25 is simply a personal computer and not part of a computer card. Moreover, in the next paragraph of the Office Action, the microchip controller is read as controller 13 of Figure 4 but it is clear that controller 13 is not part of a computer card and is different from the computer 25 that the Examiner reads as being the computer card or part of the computer card.

Turning next to the contentions at page 7 of the Office Action wherein it is admitted that the Barrett patent does not appear to teach a number of the elements set forth in the claim, even assuming that the Examiner is correct in contending that Barrett teaches “a system for electric pneumatic devices, which control a wide variety of parameters,” this clearly does not mean that it would have “been obvious to one skilled in the art at the time the of the invention to modify Barrett (USPN 5,311,451) to control the other parameters in the claimed invention.” As indicated above, the Barrett patent is concerned with controlling environmental conditions, i.e., climate conditions, in an office building, and clearly has nothing to do with, for example, monitoring and controlling tire inflation and deflation of a tire. Moreover, it is respectfully submitted that the Examiner has misread the case cited (Ex parte Masham, 2 USPQ 2d-1647 (1987)). The Masham case dealt with the recitation “completely submerged in the developer material” and, in this case, the prior art discloses an apparatus for mixing flowing developer material. The Board held that the quoted language did not impose any structural limitations which differentiated the claimed apparatus from this prior art. The situation here is completely different. In the present invention, the claimed microchip controller receives a number of specific inputs and, based on these inputs, controls solenoid valves for, for example, controlling inflation of a tire with air and deflation of a tire. The recitations in the claims constitute structural limitations in accordance with the holding of numerous cases relating to computers or computer controllers, and thus the limitations in question cannot simply be ignored or read out of the claims as the Examiner appears to be proposing. Of course, as set forth above, these limitations simply are not obvious from the teachings of the Barrett patent relating to an environmental condition controller.

Turning to the dependent claims, these claims are, of course, patentable for at least the reasons set forth above in support of the patentability of claim 45. However,

many of these claims set forth further features that are not disclosed in the reference. For example, with respect to claim 46, the Examiner states that Barrett "teaches the liquid crystal display comprises a front display, and wherein the system further comprises a rear liquid crystal display. (27 figure 1)." Element 27 in Figure 1 of Barrett is a CRT display provided on a separate module and clearly is not a teaching of the subject matter of claim 46.

With respect to claim 47, the Examiner contends that Barrett "teaches the microchip controller transmits information to the front display and to the rear display, before, during and after the calibration operation, to provide displaying of previously defined message. (310 figure 3)." Unit 310 in Barrett is simply a computer and there is no teaching in Barrett of the subject matter of claim 47.

Similar remarks apply to most if not all of the dependent claims. It is respectfully submitted that it appears what the Examiner has done here is simply quote the language recited in the claims and then cite a unit or component of the Barrett patent that is supposed to but does not, in fact, constitute a teaching of the recited subject matter.

For the reasons set forth above, it is respectfully submitted that this application is now in condition for allowance.

END REMARKS